



Anisa A. Latif
Associate Director
Federal Regulatory

AT&T Services, Inc.
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Washington, D.C. 20005

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February 8, 2006

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

**Re: ERRATUM – Certificate of CPNI Filing
EB Docket No. 06-36; EB-06-TC-060**

Dear Ms. Dortch:

AT&T Inc. ("AT&T") hereby files an erratum to its Certificate of CPNI Filing, submitted on February 6, 2006 in WC Docket No. 05-196. AT&T erroneously submitted its filing under the docket number indicated in the Commission's Public Notice dated January 30, 2006 (DA No. 06-223). Therefore, AT&T re-submits its Certificates of CPNI Filing under the correct docket number, referenced above, as indicated in the Commission's Public Notice dated February 2, 2006 (DA No. 06-258). A receipt of the original filing is also attached.

Additionally, AT&T attaches the Certificates of CPNI Filing for AT&T Enterprise Services, Inc. and AT&T Corp., which were not included in its original filing under WC Docket No. 05-196.

Should you have any questions, feel free to contact me.

Sincerely,

/s/ Anisa A. Latif

Anisa A. Latif

cc: Byron McCoy

Certificate of CPNI Filing

February 8, 2006

Submitted by AT&T Services, Inc.

EB Docket No. 06-36;

EB-06-TC-060

ECFS Submission

**Federal Communications Commission**

The FCC Acknowledges Receipt of Comments From ...

AT&T Services, Inc.

...and Thank You for Your Comments

Your Confirmation Number is: '200626269039 '

Date Received: Feb 6 2006

Docket: 05-196

Number of Files Transmitted: 1

DISCLOSURE

This confirmation verifies that ECFS has received and accepted your filing. However, your filing will be rejected by ECFS if it contains macros, passwords, redlining, read-only formatting, a virus or automated links to source documents that is not included with your filing. Filers are encouraged to retrieve and view their filing within 24 hours of receipt of this confirmation. For any problems contact the Help Desk at 202-418-0193.

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Commissioners

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updated 12/11/03

Certification of CPNI Filing

February 6, 2006

EB-06-TC-060

Submitted by: AT&T Services, Inc.

ECFS Submission

East

CORPORATE CPNI CERTIFICATE

In accordance with the requirements of 47 C.F.R. 64.2009(e), I, Michele Macauda, President and Chief Executive Officer SBC Connecticut, as an officer of SBC Connecticut, certify as follows:

1. As of June 1, 2005, SBC Connecticut has established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U – Customer Proprietary Network Information of the FCC's rules, 47 CFR § 64.2001 et. seq. (the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject matter experts (SMEs) upon whom I have reasonably relied in making this certification.

Michele Macauda
Michele Macauda
President and Chief Executive Officer
SBC Connecticut

7/15/05
Date

ATTACHMENT

In accordance with the provisions of 47 C.F.R. § 64.2009(e), SBC Connecticut provides the following explanation of how the operating procedures it has established are designed to ensure that it is or is not in compliance with the FCC's CPNI rules:

1. 47 C.F.R. § 64.2005

SBC Connecticut has adopted operating procedures designed to ensure:

- a) that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);

2. 47 C.F.R. § 64.2007

SBC Connecticut has adopted operating procedures designed to ensure:

- a) that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
- b) that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
- c) that disclosure of or access to CPNI provided by SBC Connecticut to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
- d) that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).

3. 47 C.F.R. § 64.2008

SBC Connecticut has adopted operating procedures designed to ensure:

- a) that, prior to any solicitation for CPNI approval, SBC Connecticut provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
- b) that SBC Connecticut maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
- c) that the content of the notification complies with the requirements of § 64.2008 (c);
- d) that it follows the notice requirements specific to opt-out notifications specified by §64.2008 (d);
- e) that it follows the notice requirements specific to opt-in notifications specified by §64.2008 (e); and

- f) that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);

4. 47 C.F.R. § 64.2009

SBC Connecticut has implemented operating procedures designed to ensure that it has:

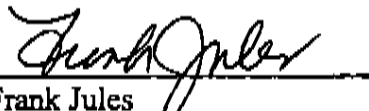
- a) implemented a system that allows the status of a customer's CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
- b) trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with its operating procedures (§ 64.2009 (b));
- c) maintained for a minimum of one year a record of its own and its affiliates' sales and marketing campaigns that use its customers' CPNI, as well as a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. This record is designed to include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. (§ 64.2009 (c)); and
- d) established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).

Global & Enterprise Markets – East

CORPORATE CPNI CERTIFICATE

In accordance with the requirements of 47 C.F.R. 64.2009(3), I, Frank Jules, President – Global & Enterprise Markets East, as an officer of SBC Enterprise Business Services, certify as follows:

1. As of June 1, 2005, SBC EBS Global & Enterprise Markets East has established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U – Customer Proprietary Network Information of the FCC's rules, 47 CFR § 64.2001 et. Seq. (the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject matter experts (SMEs) upon whom I have reasonably relied in making this certification.


Frank Jules
President – Global & Enterprise Markets East
SBC EBS

6/23/05
Date

CPNI Information Additional Documentation**Executive Summary - Customer Proprietary Network Information (CPNI)**

Pursuant to federal law and Federal Communications Commission (FCC) rules, SBC must have customer permission to access customer records to market telecommunications services outside the customer's existing service relationship or to market information services. A customer's consent may be explicit (Opt-In), or may be implied by notifying customers in writing of their privacy rights and explaining how they can contact SBC to deny consent (Opt-Out). Currently, the OPT-IN method is used for the Traditional and National accounts in Global Markets; specifically, the customer's consent is obtained in writing. The OPT-OUT method is currently used by Enterprise accounts. In both cases, recent issues require that process improvements be made in order to remain compliant.

The current M&Ps do not ensure that accounts are properly noted, steps to complete CPNI approval are missing, notes required for audit processes are not listed, and information on the accounts to ensure that Sales employees are in compliance with the Law are missing.

Currently working on updating the M&Ps for Global Markets to ensure that all identified GAPS are corrected. This includes new procedure for documenting verification by adding extra fields in Horizon. Also, additional guidance will be provided to Sales through the M&P for more clarity.

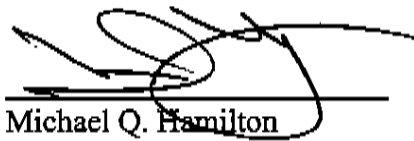
We will re-evaluate this process next year if the proposed merger is approved.

Global & Enterprise Markets – West

CORPORATE CPNI CERTIFICATE

In accordance with the requirements of 47 C.F.R. 64.2009(3), I, Michael Hamilton, President – Global & Enterprise Markets West, as an officer of SBC Enterprise Business Services, certify as follows:

1. As of June 1, 2005, SBC EBS Global & Enterprise Markets West has established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U – Customer Proprietary Network Information of the FCC's rules, 47 CFR § 64.2001 et. Seq. (the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject matter experts (SMEs) upon whom I have reasonably relied in making this certification.



Michael Q. Hamilton
President – Global & Enterprise Markets West
SBC EBS

6-27-05
Date

Attachment 1

CPNI Information Additional Documentation**Executive Summary - Customer Proprietary Network Information (CPNI)**

Pursuant to federal law and Federal Communications Commission (FCC) rules, SBC must have customer permission to access customer records to market telecommunications services outside the customer's existing service relationship or to market information services. A customer's consent may be explicit (Opt-In), or may be implied by notifying customers in writing of their privacy rights and explaining how they can contact SBC to deny consent (Opt-Out). Currently, the OPT-IN method is used for the Traditional and National accounts in Global Markets; specifically, the customer's consent is obtained in writing. The OPT-OUT method is currently used by Enterprise accounts. In both cases, recent issues require that process improvements be made in order to remain compliant.

The current M&Ps do not ensure that accounts are properly noted, steps to complete CPNI approval are missing, notes required for audit processes are not listed, and information on the accounts to ensure that Sales employees are in compliance with the Law are missing.

Currently working on updating the M&Ps for Global Markets to ensure that all identified GAPS are corrected. This includes new procedure for documenting verification by adding extra fields in Horizon. Also, additional guidance will be provided to Sales through the M&P for more clarity.

We will re-evaluate this process next year if the proposed merger is approved.

Midwest Business Communications Services

07/15/2005 07:59 2103512177

HILL-ARDOIN/SILVA

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Attachment 1

CORPORATE CPNI CERTIFICATE

In accordance with the requirements of 47 C.F.R. 64.2009(3), I, Vicki Jones, President-Business Communications Services, as an officer of SBC Midwest¹ certify as follows:

1. As of June 1, 2005, SBC Midwest has established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U - Customer Proprietary Network Information of the FCC's rules, 47 CFR § 64.2001 et. Seq. (the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject matter experts (SMEs) upon whom I have reasonably relied in making this certification.



Vicki Jones
President - Business Communications Services
SBC Midwest

7/11/05

Date

¹ As used in this certification, the term "SBC Midwest" refers collectively to Illinois Bell Telephone Company, Indiana Bell Telephone Company, Michigan Bell Telephone Company, Ohio Bell Telephone Company, Wisconsin Bell Telephone Company and Midwest Business Communication Services division of SBC Global Services, Inc.,

CPNI Information Certification

Name: William S. O'Toole

Title: Associate Director Billing/Regulatory

Organization: SBC Midwest Billing/Regulatory

Phone: (708) 756-8346

1. I have been asked to confirm the accuracy of information used in support of the 2004/2005 Corporate CPNI Certifications as of June 1, 2005.

2. Specifically, I have been asked to confirm that SBC Operations, Inc. has established operating procedures that are adequate to ensure compliance with the following FCC rules for the SBC Southwest, SBC Midwest, and SBC West Business Communications Services (BCS) and SBC Global Markets business units:

- a. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer as required by 47 C.F.R. § 64.2007 (a)(2);
- b. that opt-in approvals for CPNI disclosure are obtained in compliance with the requirements of 47 C.F.R. § 64.2007 (b)(3);
- c. that, prior to any solicitations for CPNI approval, individual notification is provided to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI in compliance with the requirements of 47 C.F.R. § 64.2008 (a) (1) and (b); and
- d. that the content of verbal notification complies with the requirements of 47 C.F.R. § 64.2008 (f)(2) for duration of call consent and 47 C.F.R. § 64.2008 (c) for the other types of CPNI consent;
- e. that instructions are provided to personnel as to when they are and are not authorized to use CPNI and there is an express disciplinary process in place as required by 47 C.F.R. § 64.2009 (b)

3. have personal knowledge that, as of June 30, 2004, operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:

- a. In my position, I am the liaison between SBC Midwest BCS and various SBC regulatory and legal teams. I am responsible for ensuring that regulatory and legal mandates and procedures are established and communicated to the BCS Midwest sales channels.
- b. I have personally reviewed all relevant M&P documentation and training materials related to CPNI in preparation for my assertions on this certification and have personal knowledge that the M&P are designed to ensure compliance with these requirements.

4. I confirm that the factual assertions made above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:



Date: July 7, 2005

Midwest Consumer Markets

Attachment 1

CORPORATE CPNI CERTIFICATE

In accordance with the requirements of 47 C.F.R. 64.2009(3), I, Shawn McKenzie, President-Consumer Markets, as an officer of Midwest,¹ certify as follows:

1. As of June 1, 2005, SBC Midwest has established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U – Customer Proprietary Network Information of the FCC's rules, 47 CFR § 64.2001 et. Seq. (the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject mater experts (SMEs) upon whom I have reasonably relied in making this certification.


Shawn McKenzie
President-Consumer Markets
SBC Midwest

7.7.05
Date

¹ As used in this certification, the term "SBC [Insert Company]" refers collectively to [Insert appropriate state company names].

CPNI Information Certification

Name: Rebecca Sutherland
Title: Associate Director - Consumer Affairs
Organization: SBC -Midwest Consumer
Phone: 216.802.7714

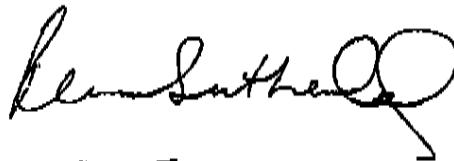
1. I have been asked to confirm the accuracy of information used in support of the Corporate CPNI Certification of Shawn McKenzie, President for SBC Midwest Consumer¹.
2. Specifically, I have been asked to confirm that SBC Midwest Consumer has adopted operating procedures designed to ensure compliance with the following FCC rules:
 - a. that, the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer as required by 47 C.F.R. § 64.2007 (a) (2);
 - b. that opt-in approvals for CPNI disclosure are obtained in compliance with the requirements of 47 C.F.R. § 64.2007 (b) (3);
 - c. that, prior to any solicitation for CPNI approval, individual notification is provided to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI in compliance with the requirements of 47 C.F.R. § 64.2008 (a) (1) and (b);
 - d. that the content of the notification complies with the requirements of 47 C.F.R. § 64.2008 (c); and
 - e. that instructions are provided to personnel as to when they are and are not authorized to use CPNI as required by 47 C.F.R. § 64.2009 (b).
3. I have personal knowledge that, as of June 1, 2005, operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
 - a. In my position, I am the liaison between SBC Midwest Consumer and various SBC regulatory and legal teams. I am responsible for ensuring that regulatory and legal mandates and procedures are established and communicated to the Consumer Midwest sales channel. As the subject

¹ As used in this certification, the term "SBC Midwest" or "SBC Midwest Consumer" refers collectively to Illinois Bell Telephone Company; Indiana Bell Telephone Company; Michigan Bell Telephone Company; The Ohio Bell Telephone Company; and Wisconsin Bell, Inc.

matter expert on CPNI, I am accountable for researching, providing responses and clarifying any questions that arise related to the subjects I support.

- b. I have personally reviewed all relevant M&P documentation and training materials related to CPNI in preparation for my assertions on this certification and have personal knowledge that the M&P are designed to ensure compliance with these requirements.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:



Date:

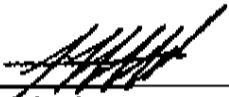
7-5-05

SBC Advanced Solutions, Inc.

CORPORATE CPNI CERTIFICATE

In accordance with the requirements of 47 C.F.R. 64.2009(3), I, John S. Habeeb, Vice President – SBC Advanced Solutions, Inc. ("SBC ASI"), as an officer of SBC ASI,¹ certify as follows:

1. SBC ASI has no sales channels of its own for its retail services, but sells such services through the sales channels of affiliated SBC companies, each of which is charged with ensuring compliance with the requirements set forth in *Subpart U-Customer Proprietary Network Information* of the FCC's rules, 47 CFR Sec. 64.2001 et seq. (the FCC's CPNI rules); and
2. By its use of the affiliated sales channels, each of which have certified that they have established operating procedures adequate to ensure compliance with the FCC's CPNI rules², and in reliance on those certifications, SBC ASI is able to affirm that, as of June 1, 2005, there are operating procedures in place that are adequate to ensure compliance with the FCC's CPNI rules.
3. This certification is based on my personal knowledge of the certificates referenced above, upon which I have reasonably relied in making this certification.



John S. Habeeb
Vice President
SBC Advanced Solutions, Inc.

7-22-05

Date

¹ As used in this certification, the term "SBC ASI" refers collectively to SBC Advanced Services, Inc., Ameritech Advanced Data Services of Illinois, Inc., Ameritech Advanced Data Services of Indiana, Inc., Ameritech Advanced Data Services of Michigan, Inc., Ameritech Advanced Data Services of Ohio, Inc. and Ameritech Advanced Data Services of Wisconsin, Inc.

² See Corporate CPNI Certificates of Charles Rudnick for SBC Southwest Business Markets; Robin MacGillivray for SBC West; Michele Macaуда for SBC Connecticut; Vicki Jones for SBC Midwest; Frank Jules for SBC Global Markets; Michael Hamilton for SBC Global Markets

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HILL-ARDQIN/SILVA

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CORPORATE CPNI CERTIFICATE

In accordance with the requirements of 47 C.F.R. 64.2009(e), I, Robin MacGillivray, President -- SBC West Business Communications Services, as an officer of SBC West,¹ certify as follows:

1. As of June 1, 2005, SBC West has established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U -- Customer Proprietary Network Information of the FCC's rules, 47 CFR § 64.2001 et. seq. (the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject matter experts (SMEs) upon whom I have reasonably relied in making this certification.



Robin MacGillivray
President -- Business Communications Services
SBC West

7/14/2005
Date

¹ As used in this certification, the term "SBC West" refers collectively to Pacific Bell Telephone Company and Nevada Bell Telephone Company.

07/14/2005 14:16 2103512177

HILL-ARDOIN/SILVA

PAGE 05/09

CPNI Information Certification

Name: Sandra Gill

Title: Compliance Manager

Organization: BCS Sales Operations, SBC West

Phone: (415) 542-4317

1. I have been asked to confirm the accuracy of information used in support of the 2004/2005 Corporate CPNI certifications.
2. Specifically, I have been asked to confirm that the SBC West Business Communications Services has established operating procedures that are adequate to ensure compliance with the following FCC rules.
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in Section 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer as required by Section 64.2007 (a)(2);
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year as required by Section 64.2007 (a)(3);
 - d. that opt-in approval for CPNI disclosure is obtained in compliance with requirements of Section 64.2007(b)(3);
 - e. that prior to any solicitation for CPNI approval, SBC West provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI as required by Section 64.2008(a)(1) and (b);
 - f. that SBC West maintains records of notification, where oral, written or electronic for at least one year as required by 64.2008 (a) (2);
 - g. that the content of the notification complies with the requirements of Section 64.2008(c);
 - h. that it follows the notice requirements specific to opt-out notifications specified by Section 64.2008(d);
 - i. that it follows the notice requirements specific to one-time use of CPNI specified by Section 64.2008(f);

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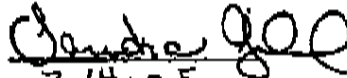
HILL-ARDOIN/SILVA

PAGE 06/09

- j. that it has implemented a system that allows the status of a customer's CPNI to be clearly established prior to the use of CPNI as required by Section 64.2009(a); and
 - k. that it has trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC's operating procedures as required by Section 64.2009(b).
3. In my position, I monitor procedures designed to make sure that SBC West's Business Communications Services operates in compliance with FCC's CPNI requirements outlined above.
4. I am personally familiar with the documents and operations that support the compliance with the FCC's CPNI requirements outlined above.
5. I confirm that the factual assertions made above are accurate, true and complete in all significant respects based on my personal knowledge.

Signature:

Date:


7-14-05

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HILL-ARDOIN/SILVA

PAGE 08/09

SOUTHWESTERN BELL TELEPHONE, L.P.**CORPORATE CPNI CERTIFICATE**

In accordance with the requirements of 47 C.F.R. 64.2009(3), I, Charles Rudnick, President of SBC Southwest Business Communications Services, as an officer of Southwestern Bell Telephone, L.P., certify as follows:

1. As of June 1, 2005, SBC Southwest Business Communications Services has established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U – Customer Proprietary Network Information of the FCC's rules, 47 CFR § 64.2001 et. Seq. (the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject matter experts (SMEs) upon whom I have reasonably relied in making this certification.



Charles Rudnick
President – Business Communications Services
SBC Southwest

7/14/05
Date

07/14/2005 14:16 2103512177

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PAGE 09/09

JUL-06-2005 07:02 FROM: SBC VP-NP FLETSCH

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TO: 2144641747

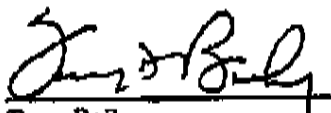
P.001/001

Attachment 1

CORPORATE CPNI CERTIFICATE

In accordance with the requirements of 47 C.F.R. 64.2009(3), I, Terry Bailey, President-Consumer Markets, as an officer of SBC Southwest Consumer,¹ certify as follows:

1. As of June 1, 2005, SBC Southwest Consumer Markets has established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U - Customer Proprietary Network Information of the FCC's rules, 47 CFR § 64.2001 et. Seq. (the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject matter experts (SMEs) upon whom I have reasonably relied in making this certification.



Terry Bailey
President- Consumer Markets
SBC Southwest

7-6-05
Date

¹ As used in this certification, the term "SBC Southwest Consumer" refers collectively to Southwestern Bell Telephone, L.P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas (SBC Southwest Consumer Markets).

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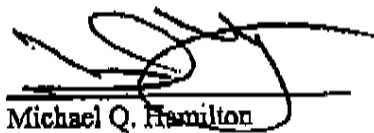
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P.01

CORPORATE CPNI CERTIFICATE

In accordance with the requirements of 47 C.F.R. 64.2009(3), I, Michael Hamilton, President – Global & Enterprise Markets West, as an officer of SBC Enterprise Business Services, certify as follows:

1. As of June 1, 2005, SBC EBS Global & Enterprise Markets West has established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U – Customer Proprietary Network Information of the FCC's rules, 47 CFR § 64.2001 et. Seq. (the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject matter experts (SMEs) upon whom I have reasonably relied in making this certification.



Michael Q. Hamilton
President – Global & Enterprise Markets West
SBC EBS

6-27-05
Date

Attachment 1

CPNI Information Additional Documentation**Executive Summary - Customer Proprietary Network Information (CPNI)**

Pursuant to federal law and Federal Communications Commission (FCC) rules, SBC must have customer permission to access customer records to market telecommunications services outside the customer's existing service relationship or to market information services. A customer's consent may be explicit (Opt-In), or may be implied by notifying customers in writing of their privacy rights and explaining how they can contact SBC to deny consent (Opt-Out). Currently, the OPT-IN method is used for the Traditional and National accounts in Global Markets; specifically, the customer's consent is obtained in writing. The OPT-OUT method is currently used by Enterprise accounts. In both cases, recent issues require that process improvements be made in order to remain compliant.

The current M&Ps do not ensure that accounts are properly noted, steps to complete CPNI approval are missing, notes required for audit processes are not listed, and information on the accounts to ensure that Sales employees are in compliance with the Law are missing.

Currently working on updating the M&Ps for Global Markets to ensure that all identified GAPS are corrected. This includes new procedure for documenting verification by adding extra fields in Horizon. Also, additional guidance will be provided to Sales through the M&P for more clarity.

We will re-evaluate this process next year if the proposed merger is approved.

07/15/2005 07:59 2103512177

HILL-ARDOIN/SILVA

PAGE 04/14

Attachment 1

CORPORATE CPNI CERTIFICATE

In accordance with the requirements of 47 C.F.R. 64.2009(3), I, Vicki Jones, President-Business Communications Services, as an officer of SBC Midwest¹ certify as follows:

1. As of June 1, 2005, SBC Midwest has established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U - Customer Proprietary Network Information of the FCC's rules, 47 CFR § 64.2001 et. Seq. (the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject matter experts (SMEs) upon whom I have reasonably relied in making this certification.



Vicki Jones
President - Business Communications Services
SBC Midwest

7/11/05
Date

¹ As used in this certification, the term "SBC Midwest" refers collectively to Illinois Bell Telephone Company, Indiana Bell Telephone Company, Michigan Bell Telephone Company, Ohio Bell Telephone Company, Wisconsin Bell Telephone Company and Midwest Business Communication Services division of SBC Global Services, Inc..

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P.03

CORPORATE CPNI CERTIFICATE

In accordance with the requirements of 47 C.F.R. 64.2009(3), I, Frank Jules, President - Global & Enterprise Markets East, as an officer of SBC Enterprise Business Services, certify as follows:

1. As of June 1, 2005, SBC EBS Global & Enterprise Markets East has established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U - Customer Proprietary Network Information of the FCC's rules, 47 CFR § 64.2001 et. Seq. (the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject matter experts (SMEs) upon whom I have reasonably relied in making this certification.



Frank Jules
President - Global & Enterprise Markets East
SBC EBS

6/23/05
Date

MAY 20 2000 16:01 FR SBC

2103513858 TO 92723099

P.04

Attachment 1

CPNI Information Additional Documentation

Executive Summary - Customer Proprietary Network Information (CPNI)

Pursuant to federal law and Federal Communications Commission (FCC) rules, SBC must have customer permission to access customer records to market telecommunications services outside the customer's existing service relationship or to market information services. A customer's consent may be explicit (Opt-In), or may be implied by notifying customers in writing of their privacy rights and explaining how they can contact SBC to deny consent (Opt-Out). Currently, the OPT-IN method is used for the Traditional and National accounts in Global Markets; specifically, the customer's consent is obtained in writing. The OPT-OUT method is currently used by Enterprise accounts. In both cases, recent issues require that process improvements be made in order to remain compliant.

The current M&Ps do not ensure that accounts are properly noted, steps to complete CPNI approval are missing, notes required for audit processes are not listed, and information on the accounts to ensure that Sales employees are in compliance with the Law are missing.

Currently working on updating the M&Ps for Global Markets to ensure that all identified GAPS are corrected. This includes new procedure for documenting verification by adding extra fields in Horizon. Also, additional guidance will be provided to Sales through the M&P for more clarity.

We will re-evaluate this process next year if the proposed merger is approved.

MAY 24 2000 16:16 FR SBC

2103513858 TO 92723099

P.02

JUL 19 2005 14:42 FR 205 111 0000

CORPORATE CPNI CERTIFICATE

In accordance with the requirements of 47 C.F.R. 64.2009(e), I, Michele Macaudo, President and Chief Executive Officer SBC Connecticut, as an officer of SBC Connecticut, certify as follows:

1. As of June 1, 2005, SBC Connecticut has established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U – Customer Proprietary Network Information of the FCC's rules, 47 CFR § 64.2001 et. seq. (the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject matter experts (SMEs) upon whom I have reasonably relied in making this certification.

Michele Macaudo
Michele Macaudo
President and Chief Executive Officer
SBC Connecticut

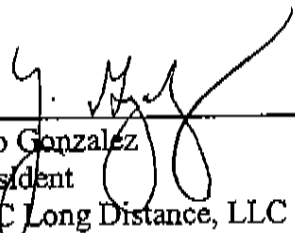
7/15/05
Date

SBC Long Distance, Inc.

CORPORATE CPNI CERTIFICATE

In accordance with the requirements of 47 C.F.R. 64.2009(3), I, Yno Gonzalez, President, SBC Long Distance, LLC ("SBCLD"), as an officer of SBCLD certify as follows:

1. As of June 1, 2005, SBCLD has established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U -- Customer Proprietary Network Information of the FCC's rules, 47 CFR § 64.2001 et. Seq. (the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject mater experts (SMEs) upon whom I have reasonably relied in making this certification.



Yno Gonzalez
President
SBC Long Distance, LLC

7-21-05
Date

CPNI Information Certification

Name: Sharon Prince
Title: Process Lead
Organization: SBC Long Distance, LLC
Phone: (847) 671-2011

1. I have been asked to confirm the accuracy of information used in support of the 2004/2005 SBC Long Distance, LLC ("SBCLD") CPNI Certifications.
2. In my job position I am responsible for reviewing and developing CPNI processes for: initial and subsequent customer notifications; recording customer CPNI status; and maintaining records of customer notice and status. These processes are in place, and to the best of my knowledge, are in compliance with FCC CPNI rules.
3. I confirm that the factual assertions made above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature: Sharon Prince
Date: July 21, 2005

CPNI Information Certification

Name: Sharon Prince
Title: Process Lead
Organization: SBC Long Distance, LLC
Phone: (847) 671-2011

1. I have been asked to confirm the accuracy of information used in support of the 2004/2005 SBC Long Distance, LLC ("SBCLD") CPNI Certifications.
2. In my job position I am responsible for overseeing the process for customers calling into SBCLD to indicate their CPNI status, ensuring that the database used for recording the customers' CPNI status is accurate and maintaining records of the customers' CPNI status. As SBCLD sends out new customer CPNI notifications, the CPNI worksheet is updated to reflect which customers were notified, and on what date. After receiving CPNI notifications, customers choosing to opt-out of use of their CPNI call into our call center on a toll-free number. Their opt-out status is recorded in the worksheet, and our process is designed to maintain these records for a two year period. For customers not calling in to opt-out within 30 days, the worksheet is updated to reflect that the customer's CPNI may be used. If the customer calls in at a later date to opt-out, then the worksheet is updated at that time to reflect the customer's current status. These processes are in place, and to the best of my knowledge, are in compliance with FCC CPNI rules.
3. I confirm that the factual assertions made above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature: Sharon Prince
Date: July 21, 2005

CPNI Information Certification

Name: Donna M. Daniele
Title: Associate Director - Regulatory
Organization: SBC Long Distance, LLC
Phone: (925) 468-6190

1. I have been asked to confirm the accuracy of information used in support of the 2004/2005 SBC Long Distance, LLC ("SBCLD") CPNI Certifications.
2. In my job position I am responsible for reviewing and auditing CPNI processes for SBC LD to ensure compliance with FCC CPNI rules. During 2004/2005 I have reviewed/audited the customer notification process and notice content, the customer opt-out process, and the SBCLD database used to record customer CPNI status. I have found each of these processes to be in compliance with FCC CPNI rules.
3. I confirm that the factual assertions made above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:

Donna M. Daniele

Date:

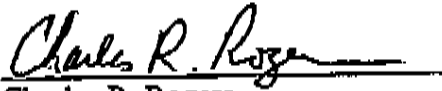
7/21/2005

SNET America, Inc. & The Woodbury Telephone Company

CORPORATE CPNI CERTIFICATE

In accordance with the requirements of 47 C.F.R. 64.2009(e), I, Charles R. Rogers, am President, and an officer of, SNET America, Inc. (SAI) and The Woodbury Telephone Company (Woodbury) and I certify as follows:

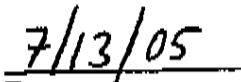
1. As of June 1, 2005, SAI and Woodbury have established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U – Customer Proprietary Network Information of the FCC's rules, 47 CFR § 64.2001 et. seq.(the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject matter experts (SMEs) upon whom I have reasonably relied in making this certification.



Charles R. Rogers

President

SNET America, Inc. and The Woodbury Telephone Company



Date

ATTACHMENT

In accordance with the provisions of 47 C.F.R. § 64.2009(e), SNET America, Inc. (SAI) and The Woodbury Telephone Company (Woodbury) provide the following explanation of how the operating procedures they have established are designed to ensure that they are or are not in compliance with the FCC's CPNI rules:

1. 47 C.F.R. § 64.2005

SAI and Woodbury have adopted operating procedures designed to ensure:

- a) that they do not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);

2. 47 C.F.R. § 64.2007

SAI and Woodbury have adopted operating procedures designed to ensure:

- a) that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
- b) that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
- c) that disclosure of or access to CPNI provided by SAI and The Woodbury Telephone Company to their joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
- d) that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).

3. 47 C.F.R. § 64.2008

SAI and Woodbury have adopted operating procedures designed to ensure:

- a) that, prior to any solicitation for CPNI approval, SAI and Woodbury provide individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
- b) that SAI and Woodbury maintain records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
- c) that the content of the notification complies with the requirements of § 64.2008 (c);
- d) that they follow the notice requirements specific to opt-out notifications specified by § 64.2008 (d);

- e) that they follow the notice requirements specific to opt-in notifications specified by §64.2008 (e); and
- f) that they follow the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);

4. 47 C.F.R. § 64.2009

SAI and Woodbury have implemented operating procedures designed to ensure that they have:

- a) implemented a system that allows the status of a customer's CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
- b) trained their personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with their operating procedures (§ 64.2009 (b));
- c) maintained for a minimum of one year a record of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI, as well as a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. This record is designed to include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. (§ 64.2009 (c)); and
- d) established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).

Southwest Business Communications Services

07/14/2005 14:16 2103512177

HILL-ARDOIN/SILVA

PAGE 00/09

SOUTHWESTERN BELL TELEPHONE, L.P.**CORPORATE CPNI CERTIFICATE**

In accordance with the requirements of 47 C.F.R. 64.2009(3), I, Charles Rudnick, President of SBC Southwest Business Communications Services, as an officer of Southwestern Bell Telephone, L.P., certify as follows:

1. As of June 1, 2005, SBC Southwest Business Communications Services has established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U – Customer Proprietary Network Information of the FCC's rules, 47 CFR § 64.2001 et. Seq. (the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject matter experts (SMEs) upon whom I have reasonably relied in making this certification.



Charles Rudnick
President – Business Communications Services
SBC Southwest

7/11/05
Date

CPNI Information Certification

LEGAL DEPT.-DALLAS
TEXAS JUL 14 2005 AREA
SW BELL TEL CO

Name: Jennifer Ball
Title: RP-Sales, Signature
Organization: Business Communication Services (SWBT)
Phone: 826 275 2725

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President -- Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
- a. In my position, RVP-Signature Accounts, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 25 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.) include review of my sales teams' adherence to CPNI processes and procedures and overviews of CPNI regulations with all new employees in the district.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:

Jennifer Ball
RVP Sales, Signature
June 30, 2005

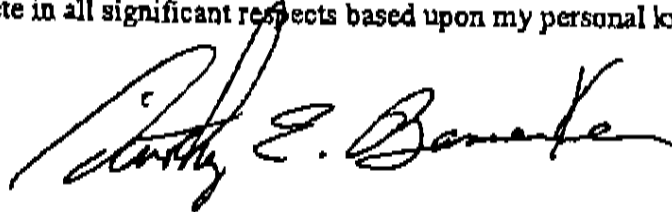
CPNI Information Certification

Name: Timothy Bannecker
Title: VP – Signature & SPORT
Organization: Business Communication Services (SWBT)
Phone: 214-576-7700

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President – Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
- a. In my position, VP -- Signature & SPORT, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 27 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations -- annual review.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:



CPNI Information Certification

Name: C. Michael Bitsche

Title: RVP – Signature Accounts

Organization: Business Communication Services (SWBT)

Phone: 214-571-7005

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President – Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas (“SBC Southwest Business Markets”).
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
 - a. In my position, RVP - Signature Accounts, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 9 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations of our process and procedures to ensure that all CPNI guidelines are understood by our sales teams. We also ensure that new people added to the team are made aware of the policies.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:



JUN-27-2005 14:17

SWBT

214 745 7253

P.01

CPNI Information Certification

Name: Curtis Browne

Title: RVP-GEM

Organization: Business Communication Services (SWBT)

Phone: (214) 571-7820

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President - Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC, Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
 - a. In my position, RVP -GEM, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 25 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Monthly work reviews are conducted to insure that my team is in compliance.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature: Curtis Browne 6/27/05
Curtis Browne Date
RVP-GEM Accounts

CPNI Information Certification

Name: Peggy Compton

Title: RVP - Account Team Support

Organization: Business Communication Services (SWBT)

Phone: 918 295-2901

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President - Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
- a. In my position, RVP-Account Team Support, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 11 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.).....
Reviewed procedures w/direct reports
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:

Peggy Compton

CPNI Information Certification

Name: Terry Feix

Title: RVP-GEM

Organization: Business Communication Services (SWBT)

Phone: 405-291-1934

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President – Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
 - a. In my position, RVP GEM accounts , I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 9 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.) Include review of my sales team's adherence to CPNI processes/procedures and overviews of CPNI regulations.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:



6-27-05

CPNI Information Certification

Name: Stacie George

Title: Regional Vice President- Sales Call Centers

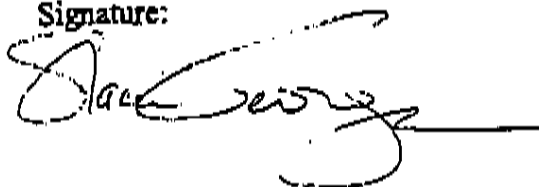
Organization: Business Communication Services (SWBT)

Phone: 806 741-6001

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President – Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas (“SBC Southwest Business Markets”).
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
- a. In my position, RVP Small & Value Sales Call Centers, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 10 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations, review & communication of processes and procedures. SBC CPNI disclosures are included in the Observing and Sales Process Flow documents.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:

A handwritten signature in black ink, appearing to read "Dale Lewis", written over a horizontal line.

CPNI Information Certification

Name: [REDACTED]
Title: Vice President-Business Solutions Group
Organization: Business Communication Services (SWBT)
Phone: 210-377-5012

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President – Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas (“SBC Southwest Business Markets”).
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer’s approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer’s right to restrict use of, disclosure of, and access to that customer’s CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
 - a. In my position, Vice President-Business Solutions Group, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 15 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.) through monthly reviews with my direct reports, and occasional call monitoring of all teams.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:

Elizabeth Gunn
ELIZABETH GUNN Vice President-F

ELIZABETH GUNN, Vice President-Business Solutions Group

Date: 6/20/05

CPNI Information Certification

Name: Todd Heckman
Title: Regional Sales Manager
Organization: Business Communication Services (SWBT)
Phone: 214-268-3496

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President – Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas (“SBC Southwest Business Markets”).
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer’s approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer’s right to restrict use of, disclosure of, and access to that customer’s CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
 - a. In my position, Regional Sales Manager-SPORT/Signature, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over Six (6) years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.). Review sales team's adherence to CPNI processes/ procedures and overviews of CPNI regulations with all new employees in the SPORT group.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:



1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President – Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

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- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
 - a. In my position, RVP - Signature Accounts, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 9 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.) ... All members of my team have been covered on CPNI Guidelines and it is documented in Personal History File.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature: 

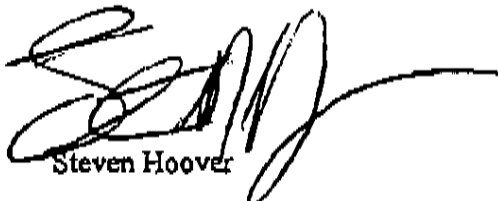
CPNI Information Certification

Name: Steven Hoover
Title: RVP-Service Provider Sales
Organization: Business Communication Services (SWBT)
Phone: 314-505-0550

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President - Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
 - a. In my position, RVP-Service Provider Sales, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 12 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations in reviewing department process and procedures.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:


Steven Hoover

CPNI Information Certification

Name: Kevin Kremer

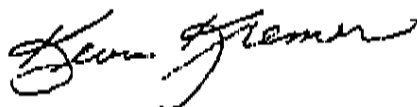
Title: Regional Vice President-GEM

Organization: Business Communication Services (SWBT)

Phone: 314-505-0011

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President - Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
 - a. In my position, RVP-GEM, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 8 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.) Code of Business Conduct is reviewed annually with all employees and CPI compliance is included as a part of the Code of Business Conduct Review. Documentation is placed in each employees training profile reflecting employee reviewed this information.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.



Signature:

CPNI Information Certification

Name: C.C. Metzler
Title: Regional Vice-President
Organization: Business Communication Services (SWBT)
Phone: 785-276-8519

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President – Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas (“SBC Southwest Business Markets”).
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer’s approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer’s right to restrict use of, disclosure of, and access to that customer’s CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
- a. In my position, RVP GEM accounts, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 17 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Annual review of processes and procedures to insure compliance with the SBC CPNI methods and procedures.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:



6/27/05

CPNI Information Certification

Name: Tonia R. Miller
Title: Area Manager BSA
Organization: Business Communication Services (SWBT)
Phone: 214 571-7600

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President – Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
- a. In my position, Area Manager GEM Accounts, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 14 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.) I will conduct a review processes in our quarterly work reviews and manager meetings.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:

Louisa Miller
Area Manager BSA

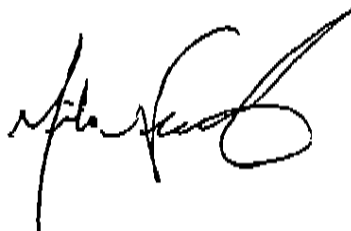
CPNI Information Certification

Name: [REDACTED]
Title: RVP - GEM TEXAS Technical Sales
Organization: Business Communication Services (SWBT)
Phone: 214 464 1400

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President - Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
- a. In my position, RVP-Technical Sales GEM accts (TX), I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 02 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.) include review of my self and teams procedures and overviews of CPNI regulations with all new employees in the district.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:

A handwritten signature in black ink, appearing to be "RVP-Technical Sales GEM accts (TX)", written over a horizontal line.

CPNI Information Certification

Name: Linda Noveck

Title: RVP - SPORT

Organization: Business Communication Services (SWBT)

Phone:

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President -- Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
- a. In my position, ~~RESPONSIBLE~~, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over ~~five~~ years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.) Conducted observations of actual customer contacts to ensure CPNI compliance.

~~Respectfully confirmed from all direct reports that the CPNI process has been reviewed and understood.~~

4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:  6/29/05

~~RESPONSIBLE~~

CPNI Information Certification

Name: Mark Palmer

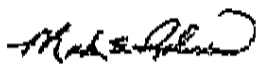
Title: RVP – Technical Sales GEM (MOKA)

Organization: Business Communication Services (SWBT)

Phone: 816-275-4828

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President – Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas (“SBC Southwest Business Markets”).
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer’s approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer’s right to restrict use of, disclosure of, and access to that customer’s CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
- a. In my position, ~~RVP, CGEM accounts, Signature accounts, etc.~~, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over ~~XX~~ years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.) ~~etc.~~
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature: 

CPNI Information Certification

Name: Kathy Passmore
Title: Regional Vice President Signature Accounts
Organization: Business Communication Services (SWBT)
Phone: 713 567-8001

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President – Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
 - a. In my position, Regional Vice President Signature Accounts, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 13 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations & training
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:

Kathy Passmore, R.V.P. 6/29/05 -

CPNI Information Certification

Name: Marsha Ragan

Title: RYP-Project Management

Organization: Business Communication Services (SWBT)

Phone: 816-275-0036

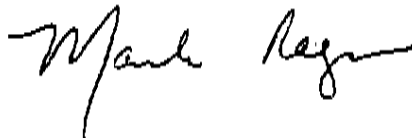
1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President - Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

07/07/2005 07:19

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- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
 - a. In my position, ~~RVP-Project Management~~, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 4 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.) include annual Code Of Business Conduct coverage with all team members which includes CPNI is 100% compliant.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:



CPNI Information Certification

Name: Susan M. Ruiz

Title: Regional Vice President-BCS Signature Sales for S/C/West Texas

Organization: Business Communication Services (SWBT)

Phone: 210-633-5670

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President - Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
 - a. In my position as Regional Vice President, BCS Signature Sales for South, Central and West Texas, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience of over 6 years in this position in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.) via monthly reviews with sales managers including tracking of their direct reports' performance re: results, compliance and following proper company procedures/policies in general; plus assuring personnel are trained as to when they are and are not authorized to use CPNI, in particular.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:

Susan Ruiz

Date:

6-16-05

CPNI Information Certification

Name: [REDACTED]

Title: Director Sales Operations


Organization: Business Communication Services (SWBT)

Phone: (210) 377-5120

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President – Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas (“SBC Southwest Business Markets”).
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
 - a. In my position, Director Sales Operations, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 26 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.)
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:



CPNI Information Certification

Name: Mark Savarino

Title: RVP - Billing Call Centers

Organization: Business Communication Services (SWBT)

Phone:

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President - Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
- a. In my position, RVP-Billing Call Centers, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over ten years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.) Conducted observations of actual customer contacts to ensure CPNI compliance.
- Conducted one-on-one reviews with direct reports to ensure compliance of CPNI directives.
- Received confirmation from all direct reports that the CPNI process has been covered and adhered to.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:  6/23/05
RVP - Billing Call Centers Date

JUL 18 2000 14:50 FR SBC

CPNI Information Certification**Name: James Shelton****Title: Regional VP – GEM (Texas)****Organization: Business Communication Services (SWBT)****Phone: 512.421.5005**

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President – Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

JUN-23-2005 10:48 FROM: RUP-GEN (12610401)

- i. that it follows the notice requirements specific to one-time use of CPNI specified by § 64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
 - a. In my position, Regional VP - OEM (Texas), I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 9 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations including attendance of team meetings where CPNI was covered, review of procedures, direct questioning of personnel concerning CPNI compliance, and special coverage of all Managers within my organization.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:



CPNI Information Certification

Name: Victoria Slabaugh

Title: RVP - Signature Accounts

Organization: Business Communication Services (SWBT)

Phone: 918-295-2600

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President - Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

Signature:

Walter Lutz

CPNI Information Certification

Name: Shelia Marks

Title: RVP SW Project Management-SOCC

Organization: Business Communication Services (SWBT)

Phone: 214-915-2233

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President -- Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
- a. In my position, RVP SW Project Management-SOCC, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 25 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations: I, RVP, Shelia Marks, affirm that all members of my team have been covered on the CPNI guidelines. Associate Directors and Managers have documented employee and date of coverage for all Non-Management employees. All management employees have confirmed individual coverage of the CPNI guidelines
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature: *Shelia Marks, RVP Affiliate, EP&S SOCC Mgrd.*

CPNI Information Certification

Name: David Syrinek

Title: Director - Network Planning and Operations

Organization: Business Communication Services (SBC Southwest)

Phone: 214-268-3010

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President - Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2),
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
 - a. In my position, Director -- Network Planning and Operations, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 28 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.) and ensure that my teams have reviewed the CPNI guidelines and agree to abide by them
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:

 6-30-05
David Syrinek
Director -- Network Planning and Operations

CPNI Information Certification

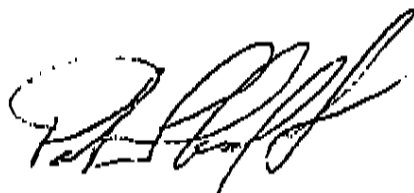
Name: Pat Thetford
Title: Regional Vice President-911 Public Safety
Organization: Business Communication Services (SWBT)
Phone: 816-275-9318

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President – Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
- a. In my position, RVP-E911 Public Safety, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 16 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.) Ensure compliance through annual coverage of Code of Business Conduct which includes CPNI information, in which we are 100% compliant.

I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:

A handwritten signature in black ink, appearing to be "R. B. Smith", written over a horizontal line.

CPNI Information Certification

Name: Mark L. Thompson
Title: Vice President-Sales
Organization: Business Communication Services (SWBT)
Phone: 816-275-2737

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President - Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
- a. In my position, Vice President-Sales (GEM accounts), I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 27 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations: reviewed the process/procedure of CPNI review with employees.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:

 7/6/05

CPNI Information Certification

Name: [REDACTED]

Title: RVP- Alternate Channels

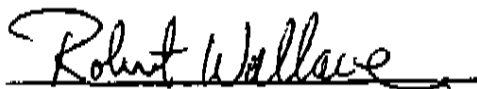
Organization: Business Communication Services (SWBT)

Phone: 210.377.5056

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President – Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
 - a. In my position, RVP Alternate Channels , I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 16 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.) with ASR and internal team sales and order processing procedures.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:


Robert WallaceDate: 06/28/05

CPNI Information Certification

Name: Larry Willis

Title: Director Sales Operations

Organization: Business Communication Services (SWBT)

Phone: 210-886-2020

1. I have been asked to confirm the accuracy of information used in support of the CPNI Certification of Charles Rudnick, President – Business Communications Services for Southwestern Bell Telephone, L. P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas ("SBC Southwest Business Markets").
2. Specifically, I have been asked to confirm that SBC Southwest Business Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Business Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Business Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Business Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that the content of the notification complies with the requirements of § 64.2008 (c);

- i. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);
 - j. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - k. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Business Markets' operating procedures (§ 64.2009 (b));
 - l. established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).
3. I have personal knowledge that, as of June 1, 2005, that operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
- a. In my position, Director Sales Operations, I am responsible for ensuring my team is aware of and complies with the SBC CPNI methods and procedures (M&P) as outlined above.
 - b. Personal work experience over 27 years in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Business Communications Services department.
 - c. Direct observations (e.g. review of processes/procedures/etc.) All members of my team have been briefed and those closest to the issue are continually aware of the rules and policies of the program.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Lawrence C. Williams
Signature:

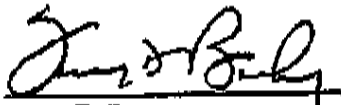
Southwest Consumer Markets

Attachment 1

CORPORATE CPNI CERTIFICATE

In accordance with the requirements of 47 C.F.R. 64.2009(3), I, Terry Bailey, President-Consumer Markets, as an officer of SBC Southwest Consumer,¹ certify as follows:

1. As of June 1, 2005, SBC Southwest Consumer Markets has established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U – Customer Proprietary Network Information of the FCC's rules, 47 CFR § 64.2001 et. Seq. (the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject matter experts (SMEs) upon whom I have reasonably relied in making this certification.



Terry Bailey
President- Consumer Markets
SBC Southwest

7-6-05
Date

¹ As used in this certification, the term "SBC Southwest Consumer" refers collectively to Southwestern Bell Telephone, L.P. d/b/a SBC Texas, SBC Oklahoma, SBC Arkansas, SBC Missouri, and SBC Kansas (SBC Southwest Consumer Markets).

Attachment 3

CPNI Information Certification

Name: Jeffrey A Burnette
Title: General Manager-Support Operations
Organization: Southwest Consumer
Phone: 314-505-0491

1. I have been asked to confirm the accuracy of information used in support of the Corporate CPNI Certification of Terry Bailey- President Consumer Markets for SBC Southwest.
2. Specifically, I have been asked to confirm that SBC Southwest Consumer Markets has adopted operating procedures designed to ensure:
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in § 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer (§ 64.2007 (a)(2));
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year (§ 64.2007 (a)(3));
 - d. that disclosure of or access to CPNI provided by SBC Southwest Consumer Markets to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in § 64.2007 (b)(2);
 - e. that opt-in approval for CPNI disclosure is obtained in compliance with the requirements of § 64.2007 (b) (3).
 - f. that, prior to any solicitation for CPNI approval, SBC Southwest Consumer Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
 - g. that SBC Southwest Consumer Markets maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
 - h. that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);

Attachment 3

- i. implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
 - j. trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC Southwest Consumer Markets operating procedures (§ 64.2009 (b));
3. I have personal knowledge that, as of June 1, 2005, operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
- a. In my position, I am responsible for M&P deployment, operations, management, and communications. I also have workgroups that receive inbound calls from Southwest customers.
 - b. Personal work experience over 1 year in connection with ensuring compliance with the SBC CPNI methods and procedures utilized by the Consumer Markets department
 - c. Direct observations of CPNI audit results and action plan development.
 - d. I also have direct contact with Central Sales Operations and am responsible for communication of scripting revisions, system/application changes, and training execution. I am reliant on their development of verbiage and processes.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:



Date: 07/22/2005

West Business Communications Services

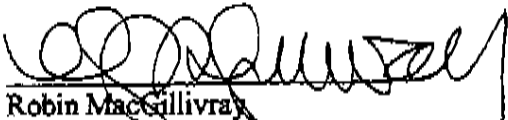
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CORPORATE CPNI CERTIFICATE

In accordance with the requirements of 47 C.F.R. 64.2009(e), I, Robin MacGillivray, President – SBC West Business Communications Services, as an officer of SBC West,¹ certify as follows:

1. As of June 1, 2005, SBC West has established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U – Customer Proprietary Network Information of the FCC's rules, 47 CFR § 64.2001 et. seq.(the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject matter experts (SMEs) upon whom I have reasonably relied in making this certification.



Robin MacGillivray
President – Business Communications Services
SBC West

7/14/2005
Date

¹ As used in this certification, the term "SBC West" refers collectively to Pacific Bell Telephone Company and Nevada Bell Telephone Company.

- a) that, prior to any solicitation for CPNI approval, SBC West provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI (§ 64.2008 (a) (1) and (b));
- b) that SBC West maintains records of notification, whether oral, written or electronic, for at least one year (§ 64.2008 (a) (2));
- c) that the content of the notification complies with the requirements of § 64.2008 (c);

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- d) that it follows the notice requirements specific to opt-out notifications specified by §64.2008 (d);
- e) that it follows the notice requirements specific to opt-in notifications specified by §64.2008 (e); and
- f) that it follows the notice requirements specific to one-time use of CPNI specified by §64.2008 (f);

4. 47 C.F.R. § 64.2009

SBC West Business Communication Services has implemented operating procedures designed to ensure that it has:

- a) implemented a system that allows the status of a customers CPNI approval to be clearly established prior to the use of the CPNI (§ 64.2009 (a));
- b) trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC's operating procedures (§ 64.2009 (b));
- c) maintained for a minimum of one year a record of its own and its affiliate's sales and marketing campaigns that use their customers' CPNI, as well as a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. This record is designed to include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. (§ 64.2009 (c)); and
- d) established a supervisory review process regarding compliance with the rules in this subpart for outbound marketing situations, including supervisory approval of any proposed outbound marketing request for customer approval. Records of compliance with this requirement are maintained for at least one year (§ 64.2009 (d)).

CPNI Information Certification

Name: Sandra Gill

Title: Compliance Manager

Organization: BCS Sales Operations, SBC West

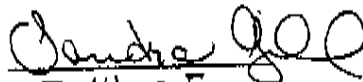
Phone: (415) 542-4317

1. I have been asked to confirm the accuracy of information used in support of the 2004/2005 Corporate CPNI certifications.
2. Specifically, I have been asked to confirm that the SBC West Business Communications Services has established operating procedures that are adequate to ensure compliance with the following FCC rules.
 - a. that it does not use, disclose or permit access to CPNI without customer approval except as described in Section 64.2005 (c) and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer as required by Section 64.2007 (a)(2);
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least one year as required by Section 64.2007.(a)(3);
 - d. that opt-in approval for CPNI disclosure is obtained in compliance with requirements of Section 64.2007(b)(3);
 - e. that prior to any solicitation for CPNI approval, SBC West provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI as required by Section 64.2008(a)(1) and (b);
 - f. that SBC West maintains records of notification, where oral, written or electronic for at least one year as required by 64.2008 (a) (2);
 - g. that the content of the notification complies with the requirements of Section 64.2008(c);
 - h. that it follows the notice requirements specific to opt-out notifications specified by Section 64.2008(d);
 - i. that it follows the notice requirements specific to one-time use of CPNI specified by Section 64.2008(f);

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- j. that it has implemented a system that allows the status of a customer's CPNI to be clearly established prior to the use of CPNI as required by Section 64.2009(a); and
 - k. that it has trained its personnel as to when they are and are not authorized to use CPNI and established an express disciplinary process for the use of CPNI that does not comply with SBC's operating procedures as required by Section 64.2009(b).
- 3. In my position, I monitor procedures designed to make sure that SBC West's Business Communications Services operates in compliance with FCC's CPNI requirements outlined above.
 - 4. I am personally familiar with the documents and operations that support the compliance with the FCC's CPNI requirements outlined above.
 - 5. I confirm that the factual assertions made above are accurate, true and complete in all significant respects based on my personal knowledge.

Signature:



Date:

7-14-05

West Consumer Markets

Privileged and Confidential/Attorney-Client Privilege/Attorney Work Product

CORPORATE CPNI CERTIFICATE

In accordance with the requirements of 47 C.F.R. § 64.2009(e), I Carmen Nava, President, SBC West Consumer Markets, as an officer of SBC West, certify as follows:

1. As of June 1, 2005, SBC West has established operating procedures that are adequate to ensure compliance with the requirements set forth in Subpart U – Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. Seq. (the FCC's CPNI rules); and
2. This certification is based upon my personal knowledge or, where I do not have such knowledge, upon the personal knowledge of SBC subject matter experts (SMEs) upon whom I have reasonably relied in making this certification.



Carmen Nava
President, Consumer Markets
SBC West

7/12/05

Date

CPNI Information Certification

Name: Irma Boucher
Title: Associate Director, Support Operations
Organization: Consumer Markets West, SBC West
Phone: (818) 778-2826

1. I have been asked to confirm the accuracy of information used in support of Corporate CPNI Certification of Carmen Nava, President, Consumer Markets West for SBC West.
2. Specifically, I have been asked to confirm that SBC West Consumer Markets Group has established operating procedures designed to ensure:
 - a. that SBC West Consumer Markets does not use, disclose or permit access to CPNI without customer approval except as described in 47 CFR Section 64.2005© and (d);
 - b. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer as specified in 47 CFR Section 64.2007 (a)(2);
 - c. that records of oral, written or electronic customer approval to use, disclose or permit access to CPNI are retained for at least a year as specified in 47 CFR Section 64.2007(a) (3);
 - d. that opt-in approval for CPNI disclosure is obtained in as described in 47 CFR Section 64.2007(b)(3);
 - e. that prior to any solicitation for CPNI approval, SBC West Consumer Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure or and access to that customer's CPNI as described in 47 CFR Section 64.2008(a)(1) and (b);
 - f. that SBC West Consumer Markets maintains records of notification, whether oral, written or electronic, for at least one year as required by 47 CFR Section 64.2008(a)(2);

- g. that SBC West Consumer Markets follows the notice requirements specific to opt-out notifications specified by 47 CFR Section 64.2008(d) and (e);
 - h. that SBC West Consumer Markets follows the notice requirements for one-time use of CPNI as specified in 47 CFR Section 64.2008(f);
 - i. that SBC West Consumer Markets has implemented a system that allows the status of a customer's CPNI approval to be clearly established prior to the use of CPNI as specified in 47 CFR Section 64.2009(a);
 - j. that SBC West Consumer Markets has trained its personnel as to when they are and are not authorized to use CPNI and has established an express disciplinary process for the use of CPNI that does not comply with SBC West's operating procedures as specified in 47 CFR Section 64.2009(b).
- 3. In my position, I am responsible for monitoring various areas of Service Representative compliance within CMG.
 - 4. As part of that responsibility, I am personally familiar with the systems, training and procedures related to the CPNI requirements outlined above. I have personal knowledge that the systems, training and procedures are designed to ensure compliance with the CPNI requirements outlined above.
 - 5. I confirm that the factual assertions made above are accurate, true and complete in all significant aspects based on my personal knowledge.

Signature:



Date:

7/8/05

CPNI Information Certification

Name: Jeffrey E. Lewis

Title: General Attorney

Organization: SBC Services, Inc.

Phone: 210.351.2065

1. I have been asked to confirm the accuracy of information used in support of the 2004/2005 Corporate CPNI Certifications as of June 1, 2005.
2. Specifically, I have been asked to confirm that the relevant SBC companies ("SBC") have established operating procedures that are adequate to ensure compliance with the following FCC rule:

Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations....including supervisory approval of any proposed outbound marketing request for customer approval. 47 C.F.R. § 64.2009 (d).

3. For outbound marketing situations, a request for review of the campaign and the proposed use of CPNI is submitted to the SBC Legal Department for approval (including requests submitted to access information contained in the Marketing Information Systems Tracker and the Enterprise Data Warehouse databases). I assumed responsibility for reviewing these requests beginning in October, 2004.
4. I confirm that the factual assertions made above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:



Date: June 1, 2005

CPNI Information Certification

Name: David Espinoza

Title: Senior Project Manager - Consumer Process

Organization: SBC Operations, Inc.

Phone: (210) 886-2223

1. I have been asked to confirm the accuracy of information used in support of the 2004/2005 Corporate CPNI Certifications as of June 1, 2005.

2. Specifically, I have been asked to confirm that SBC Operations, Inc. has established operating procedures that are adequate to ensure compliance with the following FCC rules for the SBC Southwest, SBC Midwest, and SBC West Consumer Markets business units:

- a. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer as required by 47 C.F.R. § 64.2007 (a)(2);
- b. that opt-in approvals for CPNI disclosure are obtained in compliance with the requirements of 47 C.F.R. § 64.2007 (b)(3);
- c. that, prior to any solicitations for CPNI approval, individual notification is provided to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI in compliance with the requirements of 47 C.F.R. § 64.2008 (a) (1) and (b); and
- d. that the content of verbal notification complies with the requirements of 47 C.F.R. § 64.2008 (f)(2) for duration of call consent and 47 C.F.R. § 64.2008 (c) for the other types of CPNI consent;
- e. that instructions are provided to personnel as to when they are and are not authorized to use CPNI and, with respect to Central Sales Operations, there is an express disciplinary process in place as required by 47 C.F.R. § 64.2009 (b).

3. I am personally familiar with the processes utilized for the development and maintenance of methods and procedures (M&Ps) relating to CPNI for the SBC Southwest, SBC Midwest, and SBC West Consumer Markets business units. I have personal knowledge that these M&Ps are designed to ensure compliance with the FCC's CPNI requirements as outlined above.

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4. I am personally responsible for the distribution of these M&Ps to the SBC Southwest, SBC Midwest and SBC West Consumer Markets business units, via an SBC internal website. The website is updated as necessary to reflect any changes in the rules or regulations concerning CPNI notification, approval and usage as described above.

5. I confirm that the factual assertions made above are accurate, true and complete in all significant respects based upon my personal knowledge.

David Espinoza
Signature:

Date: June 27, 2005

CPNI Information Certification


Name: Matthew D. Roesner

Title: Director - Business Process

Organization: SBC Operations, Inc.

Phone: (847) 248-6189

1. I have been asked to confirm the accuracy of information used in support of the 2004/2005 Corporate CPNI Certifications as of June 1, 2005.
2. Specifically, I have been asked to confirm that SBC Operations, Inc. has established operating procedures that are adequate to ensure compliance with the following FCC rules for the SBC Southwest, SBC Midwest, and SBC West Business Communications Services (BCS) and SBC Global Markets business units:
 - a. that the customer's approval or disapproval to use, disclose or permit access to CPNI remains in effect until revoked or limited by the customer as required by 47 C.F.R. § 64.2007 (a)(2);
 - b. that opt-in approvals for CPNI disclosure are obtained in compliance with the requirements of 47 C.F.R. § 64.2007 (b)(3);
 - c. that, prior to any solicitations for CPNI approval, individual notification is provided to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI in compliance with the requirements of 47 C.F.R. § 64.2008 (a) (1) and (b); and
 - d. that the content of verbal notification complies with the requirements of 47 C.F.R. § 64.2008 (f)(2) for duration of call consent and 47 C.F.R. § 64.2008 (c) for the other types of CPNI consent;
 - e. that instructions are provided to personnel as to when they are and are not authorized to use CPNI and, with respect to Central Sales Operations, there is an express disciplinary process in place as required by 47 C.F.R. § 64.2009 (b).
3. In my position, I supervise the project team who coordinates with the employee group responsible for the development and maintenance of methods and procedures (M&Ps) designed to make sure that the SBC Southwest, SBC Midwest, and SBC West BCS and Global Markets business units operate in compliance with the FCC's CPNI requirements as outlined above.

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4. I am personally familiar with the processes utilized for the development and maintenance of these M&Ps, and have personal knowledge that the M&P are designed to ensure compliance with these requirements.

5. My project team ensures that the responsible employee group distributes these M&Ps to the SBC Southwest, SBC Midwest and SBC West BCS, and to SBC Global Markets business units, via an SBC internal website. The website is updated as necessary to reflect any changes in the rules or regulations concerning CPNI notification, approval and usage as described above.

6. I confirm that the factual assertions made above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature: *Mathew Rosen*

Date: June 27, 2005

CPNI Information Certification

Name: Moses Covarrubias

Title: Director - Sourcing Operations

Organization: SBC Services, Inc.

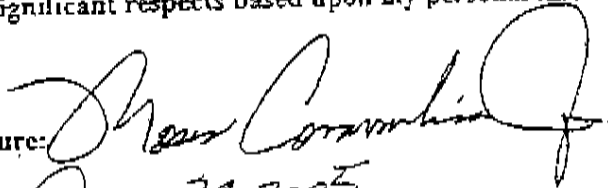
Phone: (210) 886-3327

1. I have been asked to confirm the accuracy of information used in support of the 2004/2005 Corporate CPNI Certifications, as of June 1, 2005.
2. Specifically, I have been asked to confirm that SBC Services, Inc. has established operating procedures intended to ensure compliance with the following FCC rules:
 - a. that disclosures of or access to CPNI provided by SBC to its joint venture partners or independent contractors is provided only pursuant to a confidentiality agreement that satisfies the safeguards outlined in §64.2007 (b)(2).
3. In my position, I am responsible for the development and administration of methods and procedures (M&P) designed to make sure that SBC's agreements with independent contractors to which SBC may disclose or provide access to CPNI are obtained in compliance with the FCC's CPNI requirements as outlined above. Additionally, I am responsible for the employee group that conducts periodic reviews of SBC's contract quality for the purpose of making sure that SBC's procurement M&P are followed.
4. The M&P for SBC's procurement organization require that contracts with independent contractors to which SBC may disclose or provide access to CPNI that are obtained through SBC's procurement process contain confidentiality provisions that include the following requirements:
 - a. Require that the independent contractor, their agents or subcontractors use the CPNI only for the purpose of marketing or providing the communications-related services for which that CPNI has been provided;
 - b. Disallow the independent contractor from using, allowing access to, or disclosing the CPNI to any other party, unless required to make such disclosure under force of law; and

- c. Require that the independent contractor have appropriate protections in place to ensure the ongoing confidentiality of consumers' CPNL.
5. SBC's procurement contract quality review process has not revealed any failure to include these provisions in SBC's contracts with independent contractors to which SBC may disclose or provide access to CPNL.
6. I confirm that the factual assertions made above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:

Date:


Jun 28, 2005

STERLING COMMERCIAL

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CPNI Information Certification

Name: Lisa Middleton
Title: Director, Customer Communications
Organization: SBC Operations, Inc.
Phone: 469.524.3016

1. I have been asked to confirm the accuracy of information used in support of the 2003 CPNI Certificates for SBC Companies.
2. Specifically, I have been asked to confirm that SBC Operations, Inc. has adopted operating procedures designed to ensure that the content of the notification complies with 47 C.F.R. Section 64.2008(c) of the FCC rule.
3. In my position, I review Customer Communications for SBC Consumer to ensure customer notifications meet SBC company communication guidelines and maintain compliance with specific rules/regulations associated with the customer notification.
4. I am personally familiar with the processes utilized for the development and distribution of these notifications, and have personal knowledge that the notifications are designed to ensure compliance with these requirements.
5. I am personally involved with the distribution of the notifications to the SBC Southwest, SBC Midwest, SBC West, and SBC East Consumer markets.
6. I confirm that the factual assertions made above are accurate, true and complete in all significant respects based upon my personal knowledge.



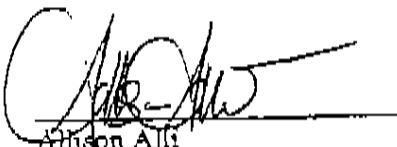
Lisa Middleton

Director, Customer Communications
SBC Operations, Inc.

CPNI Information Certification

Name: Allison Alli
Title: Associate Director, SBC Operations
Organization: Customer Communications Business
Phone: 314-206-6000

1. I have been asked to confirm the accuracy of information used in support of the 2005 CPNI Certificates for SBC Companies.
2. Specifically, I have been asked to confirm that SBC Operations, Inc. has adopted operating procedures designed to ensure that the content of the notification complies with 47 C.F.R. Section 64.2008(c) of the FCC rule.
3. In my position, I review Customer Communications for SBC Business to ensure customer notifications meet SBC company communication guidelines and maintain compliance with specific rules/regulations associated with the customer notification.
4. I am personally familiar with the processes utilized for the development and distribution of these notifications, and have personal knowledge that the notifications are designed to ensure compliance with these requirements.
5. I am personally involved with the distribution of the notifications to the SBC Southwest, SBC Midwest, SBC West, and SBC East Business markets.
6. I confirm that the factual assertions made above are accurate, true and complete in all significant respects based upon my personal knowledge.


Allison Alli
Associate Director
SBC Operations

CPNI Information Certification

Name: Rob Stewart

Title: Director - Campaign Planning & List Generation

Organization: SBC Operations Inc.

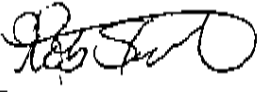
Phone: (210) 242-2217

1. I have been asked to confirm the accuracy of information used in support of the 2004/2005 Corporate CPNI Certifications.
2. Specifically, I have been asked to confirm that SBC Operations, Inc. has adopted operating procedures adequate to ensure compliance with the following FCC requirements:
 - a. that it maintains for a minimum of one year a record of its own and its affiliate's sales and marketing campaigns that use their customers' CPNI, as well as a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. This record is designed to include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. 47 C.F.R. § 64.2009 (c); and
 - b. that records of compliance with the requirement for a supervisory review for outbound marketing situations are kept for at least one year as required by 47 C.F.R. § 64.2009 (d) .
3. In my job position I am responsible for supervising the campaign list generation team for SBC Operations, Inc. Requests to generate sales and marketing campaigns are submitted by SBC's marketing group through the SBC Operations Marketing Information Systems Tracker (MIST). The campaign list generation team produces outbound telemarketing and direct mail campaigns for SBC affiliates in fulfillment of those requests.
4. The MIST process is designed so that requests for sales and marketing campaign lists include a description of each campaign; the specific information, including CPNI, to be used in the campaign; and the products and services offered as part of the campaign. MIST campaign records also indicate when outbound marketing campaign information is provided to SBC's third party vendors.

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5. Before CPNI data is used for outbound marketing campaigns, the MIST system automatically forwards a request to the SBC Legal Department for review and approval. The campaign generation team will not release outbound marketing campaign data without Legal Department approval of the MIST request.
6. I confirm that the factual assertions made above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature: 

Date: June 27, 2005

06/28/05 19:20 FAX 210 377 1100

CPNI Information Certification

Name: Alec Detwiler

Title: Associate Director – Customer Analytics & Research

Organization: SBC Operations, Inc.

Phone: (210) 242-2268

1. I have been asked to confirm the accuracy of information used in support of the Corporate CPNI Certification of for SBC Operations, Inc.
2. Specifically, I have been asked to confirm that SBC Operations, Inc has adopted operating procedures designed to ensure:
 - a. *That*, All carriers shall maintain a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. All carriers shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Carriers shall retain the record for a minimum of one year. Title 47 § 64.2009 (c);
 - b. *That*, Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval. Title 47 § 64.2009 (d);
3. I have personal knowledge that, as of June 20, 2005, operating procedures designed to ensure compliance with the above requirements have been implemented. My personal knowledge is based upon the following:
 - a. In my position, I am responsible for the project management of SBC Operations, Inc.'s Marketing Information Systems Tracker (MIST). The MIST system is used to track campaign and reporting requests from SBC's marketing organizations. This system has built-in functionality that requires SBC's Legal Department to review CPNI disclosure.
 - b. Records of each campaign request that are received by the MIST system are stored for a minimum of one year. The MIST system also maintains records of the Legal Department approval/denial of requests for outbound marketing campaigns for a minimum of one year.
4. I confirm that the factual assertions contained above are accurate, true and complete in all significant respects based upon my personal knowledge.

Signature:

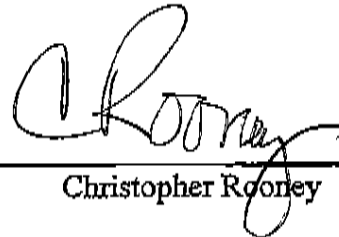


Date: 6/28/05

AT&T Enterprise Services, Inc.

CPNI COMPLIANCE CERTIFICATE

I, Christopher Rooney, Senior Vice-President of AT&T Enterprise Services, Inc., ("AT&T"), with responsibility for sales to large business customers certify, based upon my personal knowledge or where I do not have such knowledge upon the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification that, for the period from November 18, 2005 to the date of this certificate, AT&T, including its wholly-owned or controlled domestic common carrier operating subsidiaries, has established operating procedures that are adequate to ensure compliance with the FCC's Part 64, Subpart U Customer Proprietary Network Information Rules, 47 C.F.R. §§ 64.2001 to 64.2009. A statement explaining how AT&T is in compliance is attached.



Christopher Rooney

Dated: February 8, 2006

EXPLANATORY STATEMENT OF CPNI COMPLIANCE

In accordance with Section 64.2009(e) of the FCC's rules, AT&T provides the following explanation of how its operating procedures are adequate to ensure compliance with the CPNI rules for large business customers.

- 1) For the period covered by the CPNI Compliance Certificate dated February 8, 2006, AT&T established operating procedures that are designed to disallow the use CPNI for purposes of marketing services outside of the category or categories of services (*i.e.*, local, interexchange and CMRS) to which the business customer subscribes with AT&T, unless the customer has given AT&T CPNI approval. *See* 47 C.F. R. § 64.2005.
- 2) AT&T has processes and procedures in place designed to obtain business customer approval to use, disclose or permit access to CPNI if AT&T intends to use CPNI in circumstances where such approval would be required. As part of the CPNI approval solicitation process, AT&T has implemented procedures designed to advise business customers of their right to restrict use of, disclosure of, and access to CPNI, and provides the customer the requisite notice information required by 47 C.F.R. §§ 64.2007 and 64.2008.
- 3) AT&T has established methods and procedures designed to implement the CPNI requirements set forth in Part 64, Subpart U of the Commission's rules. AT&T has provided adequate training and implemented appropriate methods and procedures regarding CPNI compliance for all sales representatives and other personnel with access to CPNI. AT&T personnel with access to CPNI are instructed to follow AT&T's methods and procedures for accessing, using and disclosing CPNI. In addition, AT&T has implemented a disciplinary process for CPNI violations. *See* 47 C.F.R. § 64.2009.

4) AT&T has established procedures to obtain opt-in customer consent to use CPNI in those circumstances where CPNI consent is required. AT&T maintains records for at least one year of the customer's consent. *See* 47 C.F.R. § 64.2007.


5) AT&T requires its joint venture partners and independent contractors to use CPNI only for the purposes of marketing or providing communications-related services for which the CPNI was provided. The joint venture partners and independent contractors are prohibited from using, allowing access to, or disclosing the CPNI to third parties. AT&T requires joint venture partners and independent contractors to have appropriate procedures in place to protect the confidentiality of business customers' CPNI. *See* 47 C.F.R. § 67.2007.

6) AT&T has implemented a system that allows the business customer's CPNI approval status to be established prior to the use of CPNI. *See* 47 C.F.R. § 67.2009.

Operations for Consumer Services of AT&T Corp.

CPNI COMPLIANCE CERTIFICATE

I, Louis N. Delery, Vice President Operations for Consumer Services, of AT&T Corp. ("AT&T"), certify, based upon my personal knowledge or where I do not have such knowledge upon the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that for the period from November 18, 2005 to the date of this certificate, AT&T, including its wholly-owned or controlled domestic common carrier operating subsidiaries, has established operating procedures that are adequate to ensure compliance with the FCC's Part 64, Subpart U Customer Proprietary Network Information Rules, 47 C.F.R. §§ 64.2001 to 64.2009. A statement explaining how AT&T is in compliance is attached.


Louis N. Delery

Dated: February 8, 2006

EXPLANATORY STATEMENT OF CPNI COMPLIANCE

In accordance with Section 64.2009(e) of the FCC's rules, AT&T provides the following explanation of how its operating procedures are adequate to ensure compliance with the CPNI rules.

1) For the period covered by the CPNI Compliance Certificate executed by Louis N. Delery, dated February 8, 2006, AT&T was not marketing its services. AT&T does not use CPNI outside of the service category or categories (*i.e.*, local and interexchange) to which the customer subscribes with AT&T, unless the customer has given AT&T CPNI approval. *See* 47 C.F. R. § 64.2005

2) AT&T has processes and procedures in place designed to obtain customer approval to use, disclose or permit access to CPNI if AT&T intends to use CPNI in circumstances where such approval would be required. As part of the CPNI approval solicitation process, AT&T advises customers of their right to restrict use of, disclosure of, and access to CPNI, and provides the customer the requisite notice information required by 47 C.F.R. §§ 64.2007 and 64.2008.

3) AT&T has established methods and procedures designed to implement the CPNI requirements set forth in Part 64, Subpart U of the Commission's rules. AT&T has provided adequate training and implemented appropriate methods and procedures regarding CPNI compliance for all sales representatives and other personnel with access to CPNI. AT&T personnel with access to CPNI are instructed to follow AT&T's methods and procedures for accessing, using and disclosing CPNI. In addition, AT&T has implemented a disciplinary process for CPNI violations. *See* 47 C.F.R. §64.2009

4) AT&T obtains customer consent to use CPNI through opt-out notices. AT&T maintains records for at least one year of the customer's notice to opt-out. See 47 C.F.R. §64.2007

5) AT&T requires its joint venture partners and independent contractors to use CPNI only for the purposes of marketing or providing communications-related services for which the CPNI was provided. The joint venture partners and independent contractors are prohibited from using, allowing access to, or disclosing the CPNI to third parties. AT&T requires joint venture partners and independent contractors to have appropriate procedures in place to protect the confidentiality of consumers' CPNI. See 47 C.F.R. §67.2007.

6) AT&T has implemented a system by which the customer's CPNI approval status can be established prior to the use of CPNI. See 47 C.F.R. §67.2009.